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WRITER'S DIRECT DIAL

November 9, 2000

RECEIVED

NOV 9 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

WRITER'S DIRECT FAX
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* NOT ADMITTED IN D.C.

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Re: Midwest Wireless Communications, L.L.C.
E-911 Phase 2 Implementation Plan

Dear Ms. Salas:

On behalf of Midwest Wireless Communications, L.L.C. ("MWC") and pursuant to Section 20.18(i) of the Commission's Rules, enclosed is a narrative statement regarding MWC's E-911 Phase 2 implementation plans.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

B. Lynn F. Ratnavale

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c: International Transcription Service (w/ enc. on diskette)
Jay Whaley (w/ enclosure)

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January 3, 2001

Via Hand Delivery

Thomas J. Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
Washington, D.C. 20554

Re: E911 Phase II Carrier Implementation Report

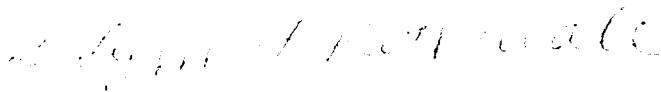
Dear Mr. Sugrue:

On behalf of Midwest Wireless Iowa, L.L.C., ("MWI"), licensee of Cellular Radiotelephone Station KNKN 362 (among others), this letter is in response to your letter dated December 27, 2000 which indicates that according to the Commission's records MWI did not file the required E911 Phase II Carrier Implementation Report by November 9, 2000.

However, our records show that MWI did file on November 9, 2000 in conjunction with its affiliates, Midwest Wireless Communications, L.L.C. and Midwest Wireless Wisconsin, L.L.C. Attached to this letter is a dated stamped receipt copy of the filing made on behalf of all three entities on November 9, 2000.

Please correct the Commission's records to reflect the timely filing by MWI. If you have any questions regarding this matter do not hesitate to contact me.

Very truly yours,



B. Lynn F. Ratnavale

✓ c: WendyAustrie

E-911 Phase II Implementation Plan

November 9th, 2000

Carrier Identifying Information

Midwest Wireless Communications L.L.C.	TRS # 812000
Midwest Wireless Wisconsin L.L.C.	TRS # 812000
Midwest Wireless Iowa L.L.C.	TRS # 812000

Contact Information

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Type of Technology

Midwest Wireless provides wireless service to rural Minnesota, Iowa and Wisconsin. We have been unsuccessful in our attempts to trial either network-based or handset-based solution. The network-based solution providers have been very busy attempting to prove their technology to the larger urban carriers. These larger carriers have been unwilling to share their test results with other carriers. Midwest Wireless has also held discussions with some of the handset manufactures in regard to the handset-based solution. However, no manufacture has provided Midwest with Phase II terminals to test and verify the accuracy of that solution either. Midwest Wireless has several concerns over declaring an E-911 Phase II technology choice. They include:

- 1) Lack of testing and verification to the best of our knowledge, of either technology choice in our service territory and/or in a similar type of rural environment.
- 2) Concern that no network-based solutions will meet the FCC accuracy mandate of 67% of the calls within 100 meters, and 95% of the calls within 300 meters, in rural environments.
- 3) Concern of the handset-based solution meeting the FCC accuracy mandate of locating 67% of calls within 50 meters and 95% of the calls within 150 meters. Midwest Wireless traffic distribution between Home and Roamer calls is approximately 92% Home, and 8% Roamer. We do not know what the breakdown of 911 specific calls are, but assume the ratio would be comparable to total traffic. Therefore, it would be very difficult for us to meet the mandate if our largest roaming partners choose network-based, and Midwest was to choose handset-based. We would have no way to locate those roamers.

Technology Declaration

Midwest Wireless will declare a network-based solution at this time. It is our belief that this technology has received the most attention from the equipment vendors to date, and it is likely that our larger roaming partners will implement a network-based solution, however we will update the Commission should this selection change.

Implementation Details and Schedule

Midwest Wireless uses Nortel Networks infrastructure for its wireless operations. We will be required to implement core network software to our Nortel DMS-MTX switches. Nortel plans to have this software available in the MTX-10 software release, which has a planned general availability of September 2001. In addition to the core network software, a Mobile Positioning Center and Position Determining Entity must also be deployed into the network to supply the location information to a Public Safety Answering Point (PSAP). It is Midwest Wireless' intention to solicit the network-based solution providers, in the anticipation of finding one that can test and verify this type of solution in our markets during 2001. Midwest Wireless will notify the FCC of a specific schedule for implementation once the vendor can confirm delivery.

Testing and Verification

Midwest Wireless has not conducted any tests of Phase II technology. When testing becomes necessary Midwest Wireless will adopt testing and verification methods and procedures based on sound engineering and statistical practices. This testing and verification will likely be incorporated into routine testing of the wireless network by company technicians.

PSAP Interface

Midwest Wireless will incorporate any required industry standards. We will transmit the data through the public switched telephone network to the PSAP following industry standards adopted by the service supplier providing E911 service to the PSAP.

Existing Handsets/Location of Non-Capable Handsets

N/A

Other Information

To date Midwest Wireless has not received any PSAP Phase II requests.